

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**LYNLEY VANSINGEL, MELANIE
MEYER, AND JESSIE PALMER,
*Plaintiffs,***

V.

**FIRST GUARANTY MORTGAGE
CORPORATION, AND PACIFIC
INVESTMENT MANAGEMENT
COMPANY, INC.,**
Defendants.

¶¶¶¶¶¶¶¶¶¶

Civil Action No. 4:22-cv-00525-SDJ

**DEFENDANT'S UNOPPOSED MOTION TO
EXTEND DEADLINE FOR INITIAL RESPONSIVE PLEADING**

Defendant Pacific Investment Management Company, Inc. (“Defendant” or “PIMCO”) submits *Defendant’s Unopposed Motion to Extend Deadline for Initial Responsive Pleading* (“Motion”) and shows the following:

I. **BACKGROUND**

Plaintiffs filed their Original Complaint and Jury Demand [ECF No. 1] on June 23, 2022. On August 9, 2022, PIMCO filed *Defendant Pacific Investment Management Company, Inc.’s Rule 12(b)(6) Rule 12(b)(6) Motion to Dismiss* (“Motion to Dismiss”) [ECF No. 7].

On August 23, 2022, Plaintiffs filed their *Plaintiffs First Amended Complaint and Jury Demand* (“First Amended Complaint”) [ECF No. 9]. Based on the filing of Plaintiffs’ amended pleading, the Court entered its *Order* on August 26, 2022, denying as moot PIMCO’s *Motion to Dismiss* [ECF No. 11].

The current deadline to file PIMCO's initial responsive pleading to Plaintiffs' *First Amended Complaint* is currently September 6, 2022.

II.
RELIEF REQUESTED

Given the nature of Plaintiffs' allegations, Defendant requires additional time to prepare its responsive pleading to Plaintiffs' *First Amended Complaint*. Accordingly, Defendant moves the Court for a brief, six-day extension to the deadline for Defendant's initial responsive pleading, from September 6, 2022, to September 12, 2022. Plaintiffs' counsel has indicated that Plaintiffs are unopposed to the relief sought by this *Motion*.

Defendant does not make this request for purposes of improper delay, but rather to ensure that it has adequate time to address the allegations in Plaintiffs' *First Amended Complaint* and prepare its responsive pleading. Defendant reserves all objections which it may have to venue, jurisdiction, process, or otherwise based on Plaintiffs' *First Amended Complaint*.

III.
CONCLUSION AND PRAYER

Defendant Pacific Investment Management Company, Inc. prays that the Court grants this *Motion* and extends the deadline for Defendant's responsive pleading to Plaintiffs' *First Amended Complaint* from September 6, 2022, to September 12, 2022.

Respectfully Submitted,

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiffs' counsel on September 6, 2022, regarding the relief sought by this *Motion*. Plaintiffs' counsel indicated that Plaintiffs are unopposed to the relief sought herein. Accordingly, the *Motion* is presented to the Court for determination.

Dated: September 6, 2022

/s/ Brent Sedge

Brent Sedge

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing document with the Clerk of Court for the United States District Court for the Eastern District of Texas on September 6, 2022, using the Electronic Case Filing system of the Court. The ECF system will send a "Notice of Electronic Filing" to all attorneys of record:

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